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PO Box 25670
Raleigh NC 27611

PLAINTIFFS

Charles A. Williams
Mosby Christopher
GUBRIAL E. CUMMINGS
JUAN ARTAS
DARRICK Grissom
Rashan A Mebane

VS

Defendants

Jamie Bullard Warden
MARC McPherson Unit manager
Johnson Jason Unit manager
Cody Collins Unit manager
Roy Cooper governor

COMPLAINT

Civil Action

NO# 5:24-CT-3095-BD

Jury TRIAL

Demanded

Jurisdiction and venue

- ① This is a civil Action authorized By 42 § U.S.C. Section 1983 to redress the deprivation under color of State Law, of rights secured by the Constitution of the United States. The court has Jurisdiction. First Amendment 14th Amendment
- ② The Eastern District of Court in Raleigh N.C is the Appropriate venue under 42 § U.S.C 1983 section because it is in Tabor corr inst where the events giving Rise to this claim occurred

③. Plaintiff's Charles A. Williams #560566#
Mosby Christopher 0468975#, GUBRIAL E Cummins
1609579#, Juan ARIAS 1210853#, Darrick grissom
1042066#, Rashan A Mebane 0771574# is and
was at all times mentioned herein A prisoners
of the state of North Carolina in the custody
of the NC Dps Tabor corr Inst. All offenders
is currently confined in Tabor corr inst in
4600 swamps fox Hwy Tabor city NC 28463

④. Defendant Jamie Bullard warden
MARC McPherson Unit manager, Johnson Jason
Unit manager, Cody Collins Unit manager
Roy Cooper State governor is Legally
Responsible For the overall operation of the
Department of NC Dps Tabor corr inst and
is under its Jurisdiction of Tabor corr inst
4600 swamps fox Hwy Tabor city NC 28463
Where plaintiffs are confined.

Roy Cooper is the State governor which is
Location Address 116 West Jones street
Raleigh NC 27603

⑤. Each defendant is sued in Both of they
Individually and official capacity. At all time
mentioned in this complaint, each defendant
Acted under the color of state Law.

FACTS OF COMPLAINT

- ⑥ All the Facts that are the Basis For plaintiff's suit is that the Plaintiff's have been deny Access to West Law on the Gth tablet which allowed all Available
- ⑦ Offenders on Restrictive Housing I-can To have. All plaintiff's is house on Gray Unit - AT Taber corr 1055 F-Block Doem. By Been deny the above Access Have cause offender Not Access to the Law Library to do legal
- ⑧ Research on matters they Need To Access To the court in a timely matter. All Plaintiff's gave the Defendants a Notice and aware that the free section For the Law Library Have Not
- ⑨ Been Down Log By the Westlaw App. When Speaking To Gray Unit Unit manager McPherson and Assist Johnson about the Law Library on the 6th tablet. Both Defendants said you offender
- ⑩ can Have access to the Law Library when you all is Released off Restrictive housing. This is a very frustrations matter where offenders Have no Access To help theyself Research legal case laws To meet deadline or arguments For Access to the court. By Record Plaintiff Charles Williams Filed a grievance Under # 4885-2022-MPduF 19452 and 4885-2022-MPduF-18717 Sec) dates 6-8-22, 9-6-22 which Both was Appeal 1, 2, 3 steps

Facts of Complaint

(12) Plaintiff Mosby Christopher Filed a grievance Under # 4885-2022-MPDUF-186-29 date 6-2-22 Which he Appeal step 1 2 3.

(13) Within Matters A witness name Grande Kimberly D Filed a Response in step 3 which Stated 'This grievance presents an issue which is beyond the control of NCDPs and therefore outside of the scope of the App see section

(14) 6306(B)(4) Lastly the tablets are equipped with West Law which should be AVAILABLE to offenders on Restrictive housing will only be permitted tablets per their Facility

(15) SOP date 6-14-2022. A witness name Greene WAKenda in Charles Willinms step 3 4885-2022-MPDUF-18717 Stated with Regards to the Law Library being on the tablet, the Law

(16) Library is Accessible to all offenders who have Access to the tablets. STAFF at the Facility do not have the capability to alter the Applications

(17) on the tablets. If there is a Application issue, you are to make your Unit Manager aware however you should be able to Report issue through help tabs on the tablet. Please keep in mind that, Offenders

(18) may still contact Prison Legal services as their route To Access Legal Research/Courts if needed

(19) This grievance is Considered Resolved 7/13/2022

Facts of Complaint

- (20). Plaintiff Charles Williams File second grievance under 4885-2022-MP DUF-19452 Step 3 witness Greene Wakenda Here stated that To her Examiners knowledge there is no issue with the Law Library At this time, unless it may be Restricted certain Restrictive housing offender. However, offenders may contact Prison Legal Services as their route to access legal Research/Court if need. This grievance is considered Resolved date 9/18/22.
- (21) I Charles Williams wrote TO prisoners legal service Request FOR cases Laws and Research Information which I Have pending cases.
- (22) DAIXI XU staff Attorney wrote me Back 9-2-22 and stated the Supreme Court in Bounds vs Smith Requires states to provide prisoners with meaningful Access to the Judicial system, either through legal assistance program or Adequate Law Libraries.
- (23) Here the Defendant McPherson and Johnson Have Failed To provide on any Access to Law Library by no assistance they duty Have cause A violation To the United states Constitutional 1st Amendment right To Access to the court.
- (24) I Requested From Prisoners legal service Help Research information. which on 9-12-2022 File # 22-0193479 THAT Daixi xu Attorney
- (25)

NCOLWS

FACTS OF COMPLAINT

- (26) Stated Dear MR Williams I am writing in Response to your letter date 9-2-22. It must be very "FRUSTRATING" to have several Lawsuits and NO Access to legal Research Resources. AS I explained in my previous letter
- (27) there is generally no right to have access to a law Library as it currently stands in NC. However it does feel "UNFair" that some inmates have Access to it while other DONOT.
- (28) I wish you and other inmates luck as you all try to get equal Access to the Law Library. Here plaintiff Darrick grissom ~~can~~ offenders on Restrictive housing for Gray Unit claim against the Defendants McPherson, Johnson, Collins All Unit managers HAVE "Discrimination" which in this
- (29) 42 § 1983 is a violation to the United States Constitutional 14th Amendments rights which also the court HAVE Full Jurisdiction
- (30) TO GRANT a violation. By the Facts and evidence. Here At Tabor corr inst general popular on Blue Unit, Green Unit Red Upper Unit The Offenders have
- (31) Access To the West law which give offender Access To the Law Library To do legal Research Free. Here Defendant Collins is in violation where he treated the offenders;

Facts of Complaint

(32) on Blue, Green, Red Unit Better than He treated offenders on Gray Unit and Lower Red seg For A-seg, ~~Detention~~ D-Seg. Evidence show Access on the GTH

(33) tablet provide offenders Access to Law Library free and Deny Restrictive housing offender Access to Law Library thru the West Law App. Here Unit manager collins is in violation

(34) of the First Amendment violation to the plaintiffs in this suit. Where he is in control of the GTH service within Tabor correctional prison and by limited the offender No Access

(35) to the Law Library deny offenders on Restrictive housing Access to the court.

(36) The court is to take in the Facts of this complaint and allowed the plaintiff to move forward after screening the Both 1st and 14th Amendment. For the

(37) Record. The Attorney General office in Raleigh cut Prisoners legal service funding which stop Prisoner legal service staff Attorneys from Research legal information

(38) For offender in prison. A contract was done between North Carolina office of Indigent Defense services and Prisoner legal service, which was sign by Thomas K. Maher

MARY S Pollard

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Facts of Complaint (877) 650-4249

(39) within Receiving GTH phone number I
Had my friend Tony L Jones call GTH and
spoke with Tomas a employee For GTH.

(40) This employee stated as a witness that GTH
have No authority to change Taber Facilities
Rules about Access to the Law Library AT
Taber corrist or which Units Receives Access
(41) to it and when it is the Administrative.

By that evidence hereby Held Jamie
Bullard in violation of Deny Offenders
(42) of Restrictive housing Access to court

By Failing to entitled the West Law App
For offenders to use the Law Library.

(43) That App is For all offenders. I hereby
and all offender claim A 1th Amendment
violation against Defendant Jamie Bullard the

(44) Warden AT Taber corrist. Offenders
of Gray Unit claim a 14th Amendment violation
against Jamie Bullard For discrimination ~~and~~ unequal
(45) treated where general popular on Blue, Red,
Green is allowed Access to the West Law App

To use the Law Library For Research and
Gray Unit offenders was deny Access To
(46) use the same free West Law App For
Law Library Research cases Laws.

Plaintiff HAVENON - Frivolous Pending Lawsuits!
Claims. Actual Injury

Facts of complaint

- (47) ON Behalf of the covid-19 The Tabor Corr inst WAS place on lockdown which offenders was only allowed out they cell For 3 hours each day within NCDps.
- (48) President Biden Federal government Commission of prison Ishee and state governor Roy Cooper and Attorney General agree this status WAS To help prisoners from getting the covid-19.
- (49) Concerning the distribution of tablets WAS MADE in contract By the third party company global tel link "GTL" which fulfills their obligation to the state of North carolina For the contract that the tablets entered into with the state wide N.C. Dps.
- (50) upon information the GTL tablets WAS Late Be passout AT Tabor corr inst cause the Global Tel Link has been in the process of trouble shooting Charging issues of the tablets. Once the issue was Resolved the correct Charging cabinets WAS order and has been delivered on site. GTL WAS in the process of putting another facility online with the tablets and the next facility to go live For Tabor corr inst to receive their Tablets. By Barnhill mark W 2-22-2022

(See) 4885-2022-KPDUB-17621 Grievance#.

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Facts of complaint

(52) on 9/1/2021 Wed about NCDPS Tabor CI
Received the GTh tablet inside the prison
For offenders all over the Units Housing
area. Call the Getting out. Here It

(53) WAS sched to us To place our pin#
the tablet. once that was done we had
To smile and Blink a couple time so
our face would Detecting our Face.

Offenders was to place they Secured passcode.
once do the GTh corporation end user

(54) License Agreement popup For us To
push Accept. once that is done.

Pay per minute For the phone

Access pass, Available pass For

(55) Purchase is allowed if offenders
Have \$15.00 To Buy. And But Last
Login Free! Is For all offenders to use.

(56) Which the West Law is Download on
It in general popular For Green Unit
Blue Unit Upper Red Unit. This is
For offenders to have Access To the
Law Library For Research on the tablet.

(57) Tabor Corr lost DONT Have a
law library downstairs where offenders
Go to check out Reading Books. No
Law Books is IN the Library office.

The Reason all Law Books was Remove in
NCDPS cause Roy Cooper work For the NC Attorney General

Facts of Complaint

(58) Office in Raleigh and came up with the idea that Offenders Don't Need Law Books cause prisoner level service office in Raleigh is To Help assist Offenders!

(59) By that Really Stop Reading material! and Library's is NC Dps was order To Remove all Books cause Offenders was helping each other out to

(60) Research and Education As Been pro-se. As of Been placed on Gray Unit I-can Status 5-23-2022 IN cell F-4

(61) Within the next date 5-23-2022 I Received My tablet. When Logging in I Notice that the Law Library was NOT gave To I and Offenders on Gray Unit

(62) which prisoners are on Restrictive housing For 180 days which is 6 months.

I hereby sent Request Forms to the Following NC Dps employee case manager

(63) Strickland 6/13/22 which he staff comments that unfortunately I have NO knowledge or Resources For the tablets. Programs staff WAS NOT included in any training For them.

(64) The Unit management staff might could AT Least direct you AS to who to write.

I hereby sent more Request Forms out To the Following

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Facts of Complaint

(65) Unit manager McPherson, Program director Sergeant On duty, Admin Assist 6/22/22

No Response was gave Back. on 6/27/2022

I sent a Request Form To Gray Unit Unit manager

(66) McPherson, Gray Unit Assist Unit manager Johnson Case manager, Program Director, Admin Asst and None Response Back. 7-26-22 I sent again

Request Form To Blue Unit PA and Unit manager

(67) collins The same date 7-26-22 I sent Gray Unit

PA Ms Roblero Request Form dealing with the

West Law on the tablet For offenders To

have Access To Law Library. None Response

Back. I wrote all letters to Library Staff.

(68) ~~Blue~~ Unit manager Jackson and Blue Unit collins

was sent a Notice about Request Formation 6-22-22

and None Response Back. I was hereby gave a

new case manager name Youker which I sent 8-30-22

(69) ~~data~~ Request form out and he answer it and

Stated He Have emailed Unit manager collins

about the issue on the West Law App For

Offenders To Have Access To Law Library on the

(70) GTL tablets. I waited about 2 weeks or more

and wrote my case manager Youker Back 9-21-2022

and he Reason Respons was that he Have Not

heard anything From Unit manager collins For

the Law Library For the GTL tablet For

Restrictive housing For Gray Unit offenders.

FACT of complaint

(71) Plaintiff Charles Williams hereby can refer to documents of Reading Material which he have Attached

At the Back of his complaint as Exhibits A-H. Here the Rest of

(72) offenders in this suit when he sending they DC 410 grievance Responses within the future to be enter on record within the clerk of court office. The court is

to Review if legal Aid program does not provided service for the prison population, a law Library must

(73) be provided. Prisons must Receive sufficient Access to prison libraries which enable them to Research Law and to determine what Facts may be necessary to state a cause of action. Court should determine

(74) whether Restricted housing actually denied anyone court Access. provision of a separate Library for

(75) Administrative Segregation inmates met constitutional Standards. Satellite Law Library Required in

Segregation Unit. Restrictive housing inmates who lack- ed physical Access and had no assistance by legally trained persons were not provided Adequate court

(76) Access. Where inmates are barred from physical Access the State must provide Research Assistance in the form persons trained in the law and but last

Cell delivery system must be supplemented by Access to inmate paralegals, a logging system and a deadline

Fact of Complaint

(77) For delivery or else a small library on the Unit. When speaking to Both Defendant McPherson and Johnson they stated No Law Library and It's out of their control, and put the Fault of the 9th. The court is To Review how Frustrations this is For offenders on 23 hours Lock down.

The Record Show I Have pending cases in ~~the~~ ~~corpus~~, TA-24729, TA-29379, TA-29926, 5:18-CT-03366, 5:14CT 03091-Bo, 09CRS-50726 09CRS 3715,

(79) Here the plaintiffs Gabriel E Cummings Filed a grievance Under # 4885-2022-MPduf 19-473 and appeal Step 1,2,3. Plaintiff Juan ARIAS filed a grievance under # 4885-2022-MPduf-

(80) 19-642 and appeal Step 1,2,3. Plaintiff Rashan A Mebane filed a grievance under 4885-2022-MPDLF 19650. Appeal step 1,2,3. All plaintiff claim a First Amendment and 14th Amendment

(81) violation For Access to court and discrimination. This claim is Made against the Defendant Jamie Bullard warden, MARC McPherson Gray Unit manager, Johnson Jason Gray Unit manager, Cody Collins Blue Unit manager AND hereby Held

(82) Roy Cooper governor Liable For employee violation of federal Rights. The Facts of Complaint and is true To all Plaintiff's allegation they WAS deny Access to court and equal treatment when dealing with the Law Library.

A Legal Claims

- (83) The Specific issues in Court Access cases Where the Defendants violated the First Amendment rights By Failed to give Law Library and Legal Assistance Its No Legal Assistance program At Jaborcorrist and By deny plaintiff Access to the Law Library under the West Law on the GTH cause Actual Injury and cases where dismissed For failure to satisfy some technical Requirement which because of deficiencies in the prison. By Not having the Law Library plaintiff could not have known or that plaintiff's Had suffered arguably actionable harm that plaintiffs wished to bring before the court, But was so stymied By inadequacies of the Law Library on GTH tablet plaintiff's was unable even to file A Complaint
- (84)
- (85)
- (86) Plaintiffs, Charles Williams, Mosby Christopher, Gabriel E. Cummings, Juan ARIAS, DARRICK Grissom and Rashan A Mebane rights was violated To the federal United States Constitutional 1st Amendments
- (87) B The Specific issues Equal Protection of the Law. Where the Defendants violated the Fourteenth Amendment Rights By Failing to allow all offenders Access to the West Law on the GTH tablets. Here the defendants made discrimination Action where Unequal

⑧ Legal claim

⑧ treatment was done. The evidence for the court is to review. That here at Taber court. All offenders is allowed a free section that involving the Law

⑨ Library where all offenders is allow to use to do Research and gather Help Law cases that can Justification they arguments in Motions. The plaintiff's

⑩ claim a discrimination cause on Gray Unit Restrictive housing offenders could NOT use the WestLaw for Research of Law Library time. General popular offenders was allowed to

⑪ use the free section to Access on the GTL tablet. Here the Defendants made it thru Unsuccessfully Judgment to NOT allowed offenders Law Library time on the GTL tablet.

⑫ This discrimination violated the federal United States Constitution 14th Amendment rights. Within the NC Dps offenders are NOT to be treated differently. The plaintiff's can show the discrimination was effect AND intent By classification level of segregate and general popular offenders.

By Race, Religion, gender, prison officials As the Defendants Have Failed equal treatment.

(94) The plaintiff's has no plain, adequate, or complete remedy at law to redress the wrongs described herein. Plaintiff's has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which plaintiff's seeks

(95) Prayed For Relief

Wherefore plaintiff's respectfully prays that this court enter judgment granting plaintiff's:

(96) A declaration that the acts and omissions described herein violated plaintiff's rights under the constitution and laws of the United States.

(97) A preliminary and permanent injunction ordering defendant Jamie Bullard, NARC McPherson, Johnson Jason, Cody Collins, Roy Cooper to add the west law on to the 6th tablets for restrictive housing on Gray Unit

(98) Compensatory Damages in the amount of \$500,000 against each defendant, jointly and severally.

(99) Punitive damages in the amount of \$500,000 against each defendant. By the record show

(100) Between compensatory and punitive damages the amount for payment is \$6 million dollars

(101) A jury trial on all issues triable by jury

(102) Defendant is to pay for costs of this suit.

(103) Any Additional Relief this court deems
Just, proper, and equitable.

(104) Date 10/7/22 Respectfully submitted

(105) Prisoners name and Address
Charles A. Williams, Mosby Christopher
Gabriel E Cummings, JUAN ARIAS, Darrick Grissom
Rashan A Mebane. Taber corr inst 4600 Swamp
Fox Hwy Taber city NC 28463

(106) VERIFICATION

I have read the foregoing Complaint and hereby
verify that the matters alleged therein are true,
except as to matters alleged on information and
belief, and, as to those, I believe them to be true,
I certify under penalty of perjury that the
Foregoing is true and correct By Charles Williams

Date 10/7/22

Charles Williams Signature

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G.S. § 10B-41 Notarial certificate For Acknowledgment

I certify that the following person personally appeared
before me this day each Acknowledging to me that
he or she signed the foregoing document

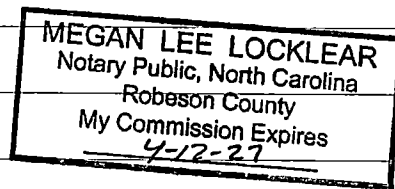
Charles Wilton

Names of principals

Official signature Meg L L
my Commission expires April 12, 2027

Official seal

Date 10/7/22



PS

See Attached Exhibits A-H

To Be Added As evidence To

this complaint. Clerk is Order

To send a free copy back After

been entered in clerk of court file